

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON GRAND JURY 2021  
FEBRUARY 7, 2023 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:22-cr-00087

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

ALEX KAI TICK CHIN

18 U.S.C. § 2260A

18 U.S.C. § 2422(b)

18 U.S.C. § 2427

S E C O N D  
S U P E R S E D I N G  
I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

From on or about December 12, 2020 through on or about February 14, 2021, at or near Huntington, Wayne County, West Virginia, and within the Southern District of West Virginia, defendant ALEX KAI TICK CHIN did employ, use, persuade, induce, entice, and coerce a minor, Minor Female 1, and attempt to employ, use, persuade, induce, entice, and coerce a minor, Minor Female 1, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and the visual depictions were transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO

From on or about December 12, 2020, through on or about February 14, 2021, at or near Huntington, Wayne County, West Virginia, and within the Southern District of West Virginia, and elsewhere, defendant ALEX KAI TICK CHIN, using a facility and means of interstate commerce, that is, a cell phone and the Internet, did knowingly persuade, induce, entice, and coerce an individual, Minor Female 1, and attempt to persuade, induce, entice, and coerce an individual, Minor Female 1, who had not attained the age of 18 years, to engage in sexual activity for which any person could have been charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2422(b) and 2427.

**COUNT THREE**

From on or about December 12, 2020, through on or about February 14, 2021, at or near Huntington, Wayne County, West Virginia, and within the Southern District of West Virginia, and elsewhere, defendant ALEX KAI TICK CHIN, an individual required by Federal or other law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Sections 2251 and 2422(b).

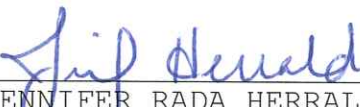
In violation of Title 18, United States Code, Section 2260A.

**FORFEITURE**

In accordance with Sections 2253(a) and 2428 of Title 18 of the United States Code, and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised on the conviction of defendant ALEX KAI TICK CHIN of a violation of 18 U.S.C. §§ 2251 et seq. and §§ 2421 et seq., as set forth in this second superseding indictment, the defendant shall forfeit to the United States any visual depictions and any books, magazines, periodicals, films, videotapes, and other matter which contains such visual depictions, which were produced, transported, mailed, shipped, or received in connection with the violations set forth in this second superseding indictment, any real and personal property constituting or traceable to gross profits or other proceeds obtained from the violations set forth in this second superseding indictment, and any real and personal property used or intended to be used to commit or to promote the commission of the violations set forth in this second superseding indictment.

WILLIAM S. THOMPSON  
United States Attorney

By:

  
JENNIFER RADA HERRALD  
Assistant United States Attorney